

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED
03 AUG 18 PM 3:09
MIDDLE DISTRICT OF FLORIDA
TAMPA
CASE NO: 8:03-cr-00177-T-30TBM

UNITED STATES OF AMERICA

v.

SAMEEH HAMMOUDEH
_____ /

**MOTION FOR EXPEDITED RECONSIDERATION OF DENIAL
OF APPOINTMENT OF CO-COUNSEL**

COMES NOW, the Defendant, SAMEEH HAMMOUDEH, by and through his undersigned attorney and moves this Honorable Court to reconsider its denial of the Defendant's appointment of co-counsel. As grounds for said Motion the following is alleged:

1. That the Defendant previously filed a Motion for Appointment of co-counsel which was subsequently denied by this Honorable Court without prejudice.
2. That the Defendant subsequently filed a Motion for Reconsideration of Denial of Appointment of Co-Counsel which has been pending for two months after this Court indicated at a status hearing in June 5, 2003, that the matter would be sent to Magistrate Thomas McCoun for ruling.
3. That the Defendant realleges all allegations stated in his original Motion for Appointment and subsequent Motion for Reconsideration.
4. That the Defendant has advised the undersigned counsel that at his preliminary hearing, shortly following his arrest, Magistrate Mark Pizzo indicated that the Defendant would likely be given the assistance of a full-time attorney, who would basically close up his practice and a second counsel who would provide additional assistance.

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6. That although the undersigned counsel is working diligently on this matter, he is unable and cannot be expected to close his practice and work full-time on this case.

7. That although the Defendant understands the undersigned predicament and is not unhappy with the undersigned, he is dissatisfied with the progress being made in the preparation of his case.

8. That the Defendant continues to be confined at the Coleman Federal Correctional Facility in Coleman, Florida, unable to frequently meet with his counsel and review evidence.

9. The appointment of co-counsel would allow for greater attorney contact and more effective preparation for trial (including the filing of pretrial motions).

10. The present circumstances of the Defendant being housed an hour and ninety minutes from Tampa and the delay in getting co-counsel appointed is delaying the Defendant's ability to be ready for trial.

WHEREFORE, the Defendant prays that this Honorable Court reconsiders, in an expedited ruling, its denial of the appointment of co-counsel in the above cause.

Dated: 8/18/03.

Respectfully submitted,



DANIEL M. HERNANDEZ, ESQUIRE

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Attorney for the Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing has been furnished to the Clerk of Court, Middle District of Florida, located at the Sam Gibbons U.S. Courthouse, 801 N. Florida Avenue, Suite# 223, Tampa, Florida 33602-4500, and correct copy has been furnished to the following interested persons on 18 day of August of the year 2003:

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